

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

(1)L LAURIE GARLAND., an individual)
Plaintiff,)
v.) Case No. CIV 2020-306-JWB
)
(1) STATE OF OKLAHOMA EX REL)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS,)
(2) CHRISTOPHER REDEAGLE, individually)
(3) SHARON MCCOY, individually)
(4) JOE ALLBAUGH, Individually)
(5) PENNY LEWIS, Individually)
(6) BOARD OF CORRECTIONS)
Defendants)

**PLAINTIFF'S APPLICATION FOR LEAVE TO SUPPLEMENT
TO RESPONSE TO MOTION FOR SUMMARY JUDGMENT**

COMES NOW the Plaintiff and asks for leave of Court to file the attached three (3) page Supplement to Response to Defendant's Motion for Summary Judgment.

In support the Plaintiff offers the following:

1. Plaintiff filed a Response to Defendant's Motion for Summary Judgment on September 27, 2021. [Doc 71].
2. Defendant, Warden McCoy was deposed on August 25, 2022 and provided additional information as to events which occurred.
3. Plaintiff seeks leave to file a Supplement to incorporate additional facts gleaned from Defendant McCoy's recent deposition and testimony.
4. Defendants have been contacted and object to this supplemental response.

WHEREFORE, Plaintiff prays for leave to file the attached Supplement to Plaintiff's Response to Motion for Summary Judgment.

/S/E. W. KELLER

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of September, 2022, I mailed a full and complete copy of the above and foregoing instrument to the following:

Jessica A. Wilkes
Assistant Attorney General
313 NE 21st Street
Oklahoma City, OK 73105

Anthony L. Allen
106 S. Okmulgee Avenue
Okmulgee, OK 74447

/S/ E. W. KELLER